

ARIZONA DEPARTMENT OF EDUCATION
Operations Divisions, Academic Achievement

LEA Comparability Quick Facts

The comparability provision of Title I of the Elementary and Secondary Education Act as amended by the No Child Left Behind Act of 2001 (NCLB) requires that all schools in LEAs receiving Title I grants receive a fair share of State and local funds.

COMPARABILITY CALCULATIONS must be based on the **40th day enrollment** and COMPLETED BY **November 30th** annually

For schools on non-traditional schedules (e.g., four-day weeks), comparisons must be made at the end of the eighth week of the school year or November 20th, but not later than November 30th. Allocation corrections at Title I schools that do not receive comparable State and local funding should be made early in the school year.

Four requirements:

- ✓ The LEA must adopt written comparability compliance procedures that include –
 - a yearly timeline for evaluating equivalence of State and local resources at all schools
 - identification of the position or staff responsible for comparing State and local spending at schools
 - a designated calculation method to measure whether schools are receiving comparable State and local funding
 - a method for resource reallocation and accounting.
- ✓ Testing comparability of services must occur every year. All LEAs receiving Title I funds must complete the Arizona Department of Education’s **LEA Profile** form to evaluate exemptions and exclusions. If a Title I school is not receiving comparable State and local funds in any year, the LEA **must reallocate resources** by promptly adjusting staff and/or funds at its schools.
- ✓ LEAs that receive Title I funds must document comparability, exclusions or exempt status. Documentation includes completed written procedures, the LEA Profile, comparable tests (usually worksheets), and supporting enrollment and expenditure data. LEAs must be prepared to substantiate comparability during every monitoring and auditing event.
- ✓ LEAs must submit an assurance of comparability to ADE every other year.

The Assurance of Comparability form appears in the COMMON LOGON under Academic Achievement Reports in November and will be labeled “FY2008 Assurance of Comparability LEAs A-L due 11/30/08.”

Be prepared to show:

- 📁 Familiarity with the current version of the ADE Comparability Handbook as it applies to your LEA
- 📁 LEA Written Comparability Procedures
- 📁 Comparability Testing Data
 - LEA Profile and supporting enrollment data
 - Worksheets and supporting State and local expenditures OR proof of exemption/exclusions
 - Conclusions
 - Reallocation implementation and retests, if necessary



Find the Comparability Handbook, Worksheets and Worksheet Instructions at ADE’s website in the [No Child Left Behind Document Library](#) under “Financial Information.”

For questions or more information, contact
Cindy Hirsch • 602-542-7466 • cindy.hirsch@azed.gov

SAMPLE LEA COMPARABILITY PROCEDURE TIMELINE

Late Winter

Governing Authority budget discussions incorporate evaluations of past Title I comparability experience, solicit input from LEA/school staff, and consider possible revisions for comparability compliance for the upcoming year. Authority may review methods of testing comparability and decide whether to continue to use method adopted. Consider whether *written procedures* need to be amended.

Spring

Governing Authority engages in instructional staff salary determinations and/or negotiations, which may result in a salary schedule.

LEA plans for equivalence of State and local spending in instructional staffing and in materials and supplies. Budget so that each school should receive about the same amount of State and local spending for instructional staff, materials and supplies.

School administration adopts revised **written Comparability Procedures**.

Summer

Follow through on grant process. (Application, plans, completion reports, etc.)

Identify Title I and non-Title I schools.

Confirm or assign expected personnel roles and responsibilities for testing comparability—data collection, calculation, custodian of records, etc.

Fall

Collect 40th enrollment data and expenditure data or instructional staffing data. Enter data into LEA Profile.

Meet with staff and make necessary adjustments to raw spending data. For example, eliminate non-instructional staff or PreK staff; make salary reductions for teacher longevity, double check figures to ensure that all federal funds are excluded.

Determine exemption or exclusions.

No later than November 30th - Complete appropriate worksheet(s). Make conclusion as to whether schools are comparable or not. Make corrections to Title I schools that are not comparable. File biennial report in Common Logon under Academic Achievement Reports if due.

Address evolving issues.

Maintain all required documentation with the Custodian of Records.